

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

SEALED

INDICTMENT

- v. -

: 05 Cr. _____

MANUEL GOMEZ,

LUCAS TORRES,

a/k/a "the Doctor,"

CARLOS ARROYO,

a/k/a "Oscar,"

SAUL REYES-RODRIGUEZ,

a/k/a "Sweet 16," and

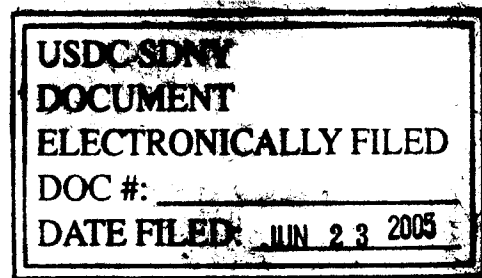
IRAM MEDINA QUINTERO,

Defendants.

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COUNT ONE

05CRIM. 661



The Grand Jury charges:

1. From in or about October 2004 through in or about May 2005, in the Southern District of New York and elsewhere, MANUEL GOMEZ, LUCAS TORRES a/k/a "the Doctor," CARLOS ARROYO a/k/a "Oscar," SAUL REYES-RODRIGUEZ a/k/a "Sweet 16," and IRAM MEDINA QUINTERO, the defendants, and others known and unknown, unlawfully, intentionally, and knowingly did combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and object of said conspiracy that MANUEL GOMEZ, LUCAS TORRES a/k/a "the Doctor," CARLOS ARROYO a/k/a "Oscar," SAUL REYES-RODRIGUEZ a/k/a "Sweet 16," and IRAM MEDINA QUINTERO, the defendants, and others known and unknown, unlawfully, intentionally, and knowingly would and did distribute

and possess with intent to distribute a controlled substance, to wit, 5 kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Sections 812, 841(a)(1) and 841(b)(1)(A) of Title 21 of the United States Code.

OVERT ACTS

3. In furtherance of the conspiracy and to effect its illegal object, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about November 22, 2004, MANUEL GOMEZ and CARLOS ARROYO a/k/a "Oscar," the defendants, spoke on the telephone about the sale of 400 kilograms of cocaine.

b. On or about November 22, 2004, MANUEL GOMEZ, the defendant, spoke on the telephone about the sale and delivery of the 400 kilograms of cocaine.

c. On or about November 27, 2004, MANUEL GOMEZ and LUCAS TORRES a/k/a "the Doctor," the defendants, met regarding the delivery of the 400 kilograms of cocaine.

d. On or about December 1, 2004, MANUEL GOMEZ and LUCAS TORRES a/k/a "the Doctor," the defendants, met regarding the delivery of kilograms of cocaine.

e. On or about December 1, 2004, CARLOS ARROYO a/k/a "Oscar," the defendant, spoke on the telephone regarding the delivery of kilograms of cocaine.

f. On or about December 1, 2004, MANUEL GOMEZ, the defendant, spoke on the telephone regarding the delivery of

193 kilograms of cocaine.

g. On or about December 2, 2004, SAUL REYES-RODRIGUEZ a/k/a "Sweet 16," the defendant, possessed approximately 193 kilograms of cocaine (the "193 Kilos") in Chicago, Illinois.

h. On or about December 2, 2004, CARLOS ARROYO a/k/a "Oscar," the defendant, spoke on the telephone regarding the seizure of the 193 Kilos.

i. On or about December 2, 2004, IRAM MEDINA QUINTERO, the defendant, possessed approximately 3 kilograms of cocaine, approximately 300 pounds of marijuana, and approximately \$50,000 in United States currency, in Chicago, Illinois.

j. On or about December 3, 2004, MANUEL GOMEZ, the defendant, spoke on the telephone regarding the sale and delivery of kilograms of cocaine to New York, New York.

k. On or about December 9, 2004, MANUEL GOMEZ, the defendant, spoke on the telephone regarding the sale and delivery of kilograms of cocaine to New York, New York.

(Title 21, United States Code, Section 846.)

FORFEITURE ALLEGATIONS AS TO COUNT ONE

4. As a result of committing one or more of the controlled substance offenses alleged in Count One of this Indictment, MANUEL GOMEZ, LUCAS TORRES a/k/a "the Doctor," CARLOS ARROYO a/k/a "Oscar," SAUL REYES-RODRIGUEZ a/k/a "Sweet 16," and IRAM MEDINA QUINTERO, the defendants, shall forfeit to the United

States pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds the said defendants obtained directly or indirectly as a result of the said violation and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violation alleged in Count One of this Indictment, including but not limited to the following:

a. A sum of money equal to \$10,000,000 in United States currency, representing the amount of proceeds obtained as a result of the offenses described in Count One of this Indictment, including but not limited to:

i. United States currency in the amount of approximately \$50,000.00, seized from the house occupied by defendant IRAM MEDINA QUINTERO on or about December 2, 2004.

Substitute Assets Provision

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

a. cannot be located upon the exercise of due diligence;

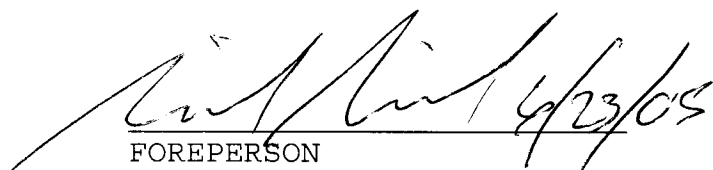
b. has been transferred or sold to, or deposited with, a third person;


c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value;
or

e. has been commingled with other property which cannot be subdivided without difficulty;
it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 841(a)(1) and 853.)


FOREPERSON


DAVID N. KELLEY
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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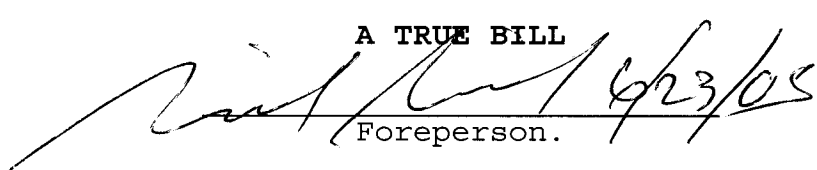
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(Title 21, United States Code,
Section 846.)

DAVID N. KELLEY
United States Attorney.

A TRUE BILL


Foreperson.

6/23/05 Filed Indictment A/warrant issued for all
Defts.

Pitman
U.S.M.T.